UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

TODD CORBET and HELENA	§	
CORBET, Individually and as Parents	§	
of BENJAMIN CORBET, deceased	§	
Plaintiffs,	§	
	§	
v.	§	**CASE NO. 1:22-cv-02457-SEB-MG**
	§	
DIAMOND AIRCRAFT INDUSTRIES	§	
INC.	§	
Defendants.	§	

DEFENDANT DIAMOND AIRCRAFT INDUSTRIES INC.'S
PRELIMINARY WITNESS AND EXHIBIT LIST

Pursuant to Federal Rule of Civil Procedure 26(a)(3)(A) and Section III(C) of the Case

Management Plan (Dkt. 23), Defendant Diamond Aircraft Industries Inc. ("Diamond") submits

this Preliminary Witness and Exhibit List. Discovery is ongoing, and Diamond reserves the right

to disclose additional witnesses and exhibits as discovery continues and supplement and/or amend

these preliminary lists, in compliance with the Federal Rules of Civil Procedure.

I.   Diamond's Preliminary Witness List:

      A.   Expects to Present:

          1.   Todd Corbet
              c/o Katherine Karres
              Hurst Limontes, LLC
              50 South Meridian Street, Suite 600
              Rochester, IN 46204
              (317) 633-7680

          2.   Helena Corbet
              c/o Katherine Karres
              Hurst Limontes, LLC
              50 South Meridian Street, Suite 600
               Rochester, IN 46204
               (317) 633-7680

3.   Diamond Aircraft Industries Inc.
         c/o Ross Cunningham
         Bryan S. David
         CUNNINGHAM SWAIM, LLP
         4015 Main Street, Suite 200
         Dallas, Texas 75226
         (214) 646-1495

4.   Daniel Hill
         Address and Telephone Unknown

5.   Expert witnesses disclosed in accordance with the Court's Case Management Plan.

B.   **May Present:**

1.   Leadership In Flight Training, LLC (DBA "LIFT Academy")
         2753 Cargo Drive
         Indianapolis, IN 46241
         (317) 471-2256

2.   Other witnesses with potentially relevant information regarding the claims and defenses asserted in this lawsuit, as they become known to Diamond.

3.   All witnesses identified by other parties in this lawsuit.

II.   **Diamond's Preliminary Exhibit List**

A.   **Expects to Offer:**

1.   *The National Transportation Safety Board's ("NTSB") Factual Report;[1]

2.   *The pilot/operator aircraft accident Report, NTSB Form 6120.1;

3.   *Witness Email;

4.   *Maintenance Records (Excerpts);

5.   *Statement of Party Representatives to NTSB Investigation;

6.   *Weight and Balance Approximation;

7.   *Photo;

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[1] The document titles containing an asterisk ("*") were produced by NTSB website link in Diamond's initial disclosures.

8.	*G1000 Flight Data Video Via Flight Ahoy (OUO);

9.	*Toxicology Report;

10.	*Field Exam;

11.	*Engine Control Unit – Specialist's Factual Report_CEN21FA252;

12.	*Attachment 1 to Engine Control Unit – Specialist's Factual Report – Tabular Defendant;

13.	*Attachment 2 to Engine Control Unit – Specialist's Factual Report – Inspection Report;

14.	*Release of Aircraft Wreckage, NTSB Form 6120.15;

15.	*Aircraft Flight Manual (Excerpts)

**B.	May Offer:**

1.	All pleadings, fact discovery, investigation reports, expert discovery (including deposition transcripts, reports and opinions);

2.	All documents reflecting the amount of damages claimed by Plaintiffs;

3.	All documents and exhibits identified by other parties in this lawsuit;

4.	Other potentially-relevant documents and information as they become known through discovery and investigation in this lawsuit.

Respectfully submitted,

/s/ Ross Cunningham
Ross Cunningham – Attorney in Charge
Bryan S. David (admission pending)
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/s/ Scott A. Harkness
Scott A. Harkness (#16418-49)

Myekeal D. Smith, Jr. (#36409-53)
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**ATTORNEYS FOR DEFENDANT DIAMOND
AIRCRAFT INDUSTRIES INC.**

CERTIFICATE OF SERVICE

     I hereby certify that on July 6, 2023, the foregoing Preliminary Witness and Exhibit List was filed electronically through the Court's Electronic Case Filing System. Notice of this filing will be sent to all counsel of record through the Court's Electronic Case Filing System.

                              /s/ Scott A. Harkness
                              Scott A. Harkness